

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA  
DURHAM DIVISION  
CASE NO. 10-81479  
CHAPTER 13

In Re:

BILLY WAYNE BROCKINGTON and  
ANGELA EVANS BROCKINGTON,

Debtors.

:  
:  
:  
:  
:  
:

To the Clerk of the United States Bankruptcy Court:

**MOTION FOR SUBSTITUTION OF COUNSEL**

**COMES NOW KHF Lending, LLC**, (hereinafter "Movant"), and moves the Court to enter an Order granting Substitution of Counsel, Mark A. Baker in place of Angel R. Gordon.

**WHEREFORE, PREMISES CONSIDERED, KHF Lending, LLC** requests that the court grant the motion.

REQUEST is further made by counsel that all Notices required to be given to parties in interest pursuant to Bankruptcy Rule 2002 be mailed to counsel.

DATED: September 9<sup>th</sup>, 2011

Respectfully submitted,

**KHF Lending, LLC**

BY:

/S/ Mark A. Baker  
Mark A. Baker , Bar No. #32382  
Attorney for KHF Lending, LLC  
1587 Northeast Expressway  
Atlanta, GA 30329  
(770) 234-9181, Ext. 8861  
Fax: (404) 329-8005  
mabaker@jfllegal.com

/S/ Angel R. Gordon  
Angel R. Gordon , Bar No. #24996  
327 Parkview Manor Drive  
Tucker, Ga 30084

## **CERTIFICATE OF SERVICE**

I, Mark A. Baker, Attorney at Law, Johnson & Freedman, LLC, 1587 Northeast Expressway, Atlanta, GA 30329, certify:

That on the 9<sup>th</sup> day of September, 2011, I served on the respondent(s) in this matter a copy of the foregoing document by regular mail, with appropriate postage affixed, at the attached addresses, or via electronic transmission, pursuant to this Court's local rule and the Federal Rules of Bankruptcy Procedure:

### **VIA REGULAR U.S. MAIL:**

Billy Wayne Brockington  
112 S. Woodcrest Street  
Durham, NC 27703

Angela Evans Brockington  
112 S. Woodcrest Street  
Durham, NC 27703

Richard M. Hutson, II  
Chapter 13 Trustee  
302 East Pettigrew St., Suite B-140  
P. O. Box 3613  
Durham, NC 27702-3613

John T. Orcutt, Esq.  
Suite 203  
6616 Six Forks Road  
Raleigh, NC 27615

This, the \_\_\_9th\_\_\_ day of \_\_\_\_\_September\_\_\_\_, 2011

BY: /S/ Mark A. Baker

Mark A. Baker, Bar No. #32382  
Attorney for KHF Lending, LLC  
1587 Northeast Expressway  
Atlanta, GA 30329  
(770) 234-9181, Ext. 8861  
Fax: (404) 329-8005  
mabaker@jfllegal.com